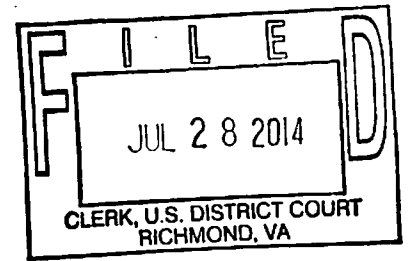


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA

v.

STEVEN HAMMOND, JR.,

Defendant.

)
)
) Criminal No. 3:14CR95 JAG
)
)
) Theft from a Program Receiving
) Federal Funds
) (Count One)
)
) Forfeiture Count
)

STATEMENT OF FACTS

The parties stipulate that allegations contained in Count One of the Criminal Information in this matter and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of them beyond a reasonable doubt:

1. On or about from 2009 through December 2013, the exact dates being unknown, in the Eastern District of Virginia, the defendant, STEVEN HAMMOND, JR., being an agent of the Virginia Department of Alcoholic Beverage Control, a Virginia governmental department receiving benefits in excess of \$10,000 yearly beginning 2009 and continuing through 2013 in grants provided by the United States Office of Juvenile Justice and Delinquency Prevention, did embezzle, steal, or obtain by fraud \$5,000 or more owned by or under the control of the Virginia Department of Alcoholic Beverage Control, in violation of 18 U.S.C. § 666(a)(1)(A).

2. HAMMOND was first employed by the Virginia Department of Alcoholic Beverage Control (ABC) in 2003. The Virginia Department of Alcoholic Beverage Control, a

Virginia governmental department, received benefits in excess of \$10,000 yearly from 2009-2013 from grants provided by the United States Office of Juvenile Justice and Delinquency Prevention (OJJDP). In September 2008 HAMMOND became the full time education coordinator with ABC. As the education coordinator, HAMMOND was responsible for the Youth Alcohol Drug Abuse Prevention program (YADAPP). As YADAPP director, HAMMOND was responsible for coordinating programs focused on youth alcohol and drug abuse prevention.

3. Beginning in 2009, HAMMOND fraudulently began preparing false paperwork, purportedly to fund YADAPP programs, that led ABC to issue checks in the names of his friends. HAMMOND arranged for his friends to cash the checks, then return the money to HAMMOND. HAMMOND then gave most of the friends a portion of the check amounts.

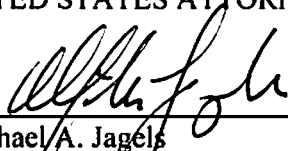
4. In total, HAMMOND had 77 fraudulent checks created by ABC totaling \$238,600.00.

5. After the scheme was discovered, HAMMOND was interviewed by state and federal law enforcement officials, and admitted to having the false checks created and receiving the majority of funds after the checks were cashed.


The actions taken by the defendant as described above were taken willfully, knowingly, and with the specific intent to violate the law. The defendant did not take those actions by accident, mistake, or with the belief that they did not violate the law.

Respectfully submitted,

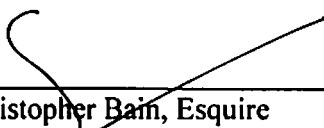
DANA J. BOENTE
UNITED STATES ATTORNEY

By: 
Michael A. Jagels
Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between myself and the United States, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


STEVEN HAMMOND, JR.
Defendant

I am the attorney for STEVEN HAMMOND, JR. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Christopher Bain, Esquire
Counsel for Defendant